

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BOARD OF PATENT APPEALS AND INTERFERENCES**

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

In Re Application of:

Pandit, et al.

Serial No.: 10/695,571

Filed: October 28, 2003

Confirmation No.: 9180

Group Art Unit: 2622

Examiner: Hernandez, Nelson D

Docket No. 200210160-1

For: ROTATABLE CAMERA DOCKING STATION SYSTEMS AND METHODS

APPEAL BRIEF UNDER 37 C.F.R. § 41.37

Mail Stop Appeal Brief - Patents:
Commissioner of Patents and Trademarks
P.O. Box 1450
Alexandria, Virginia 22313-1450

Sir:

This Appeal Brief under 37 C.F.R. § 41.37 is submitted in support of the Notice of Appeal filed on October 29, 2007, responding to the final Office Action mailed July 27, 2007 (Part of Paper No./Mail Date 20070712), rejecting claims 1-20 in the present application and making the rejection FINAL, and to the Advisory Action mailed September 28, 2007 (Part of Paper No./Mail Date 20070920), which indicated that claims 1-20 are rejected.

I. REAL PARTY IN INTEREST

The real party in interest is Hewlett-Packard Development Company, LP, a limited partnership established under the laws of the State of Texas and having a principal place of business at 20555 S.H. 249 Houston, TX 77070, U.S.A. (hereinafter "HPDC"). HPDC is a Texas limited partnership and is a wholly-owned affiliate of Hewlett-Packard Company, a Delaware Corporation, headquartered in Palo Alto, CA. The general or managing partner of HPDC is HPQ Holdings, LLC.

II. RELATED APPEALS AND INTERFERENCES

There are no related appeals or interferences.

III. STATUS OF THE CLAIMS

Claims 1-20 are pending in the present application. Through prosecution of this matter, no claims have been canceled. Claims 1-20 were rejected by the FINAL Office Action dated July 27, 2007 and are the subject of this appeal.

IV. STATUS OF AMENDMENTS

No amendments have been made or requested since the mailing of the FINAL Office Action and all amendments submitted prior to the FINAL action have been entered. A copy of the currently pending claims is attached hereto as Appendix, section IX.

V. SUMMARY OF THE CLAIMED SUBJECT MATTER

Embodiments of the claimed subject matter are illustrated in FIGs. 1-10 and are discussed in the specification at least at pages 2-10.

Embodiments of the claimed subject matter, such as those defined by claim 1, define a system (see, e.g., Figure 1, reference numeral 100, page 2, line 1 to page 3, line 10) which docks a camera (see, e.g., Figure 1, reference numeral 102, page 2, line 1 to page 3, line 10), comprising: a base (see, e.g., Figure 1, reference numeral 106, page 3, lines 11-18); and a platform (see, e.g., Figure 1, reference numeral 104, page 3, lines 11-18) configured to dock with the camera and configured to couple to the base such that the platform may be rotated relative to the base and about an axis of rotation.

Embodiments of the claimed subject matter, such as those defined by claim 5, define the system of claim 1 as further comprising at least one leg (see, e.g., Figure 7, reference

numeral 704, page 7, lines 21-26) coupled to the base (see, e.g., Figure 7, reference numeral 708, page 7, lines 21-26).

Embodiments of the claimed subject matter, such as those defined by claim 7, define the system of claim 1 wherein the platform further comprises a pedestal platform (see, e.g., Figure 8, reference numeral 804, page 7, lines 31-34), the pedestal platform configured to dock the camera and to display marketing devices placed on the pedestal platform (see, e.g., page 8, lines 3-9).

Embodiments of the claimed subject matter, such as those defined by claim 8, define the system of claim 1 as further comprising a pedestal base (see, e.g., Figure 8, reference numeral 806, page 7, lines 31-34); and a plurality of pedestal platforms wherein a plurality of cameras may be docked (see, e.g., page 8, lines 27-32).

Embodiments of the claimed subject matter, such as those defined by claim 11, define a method (see, e.g., Figure 10, reference numeral 1000, page 9, line 29 to page 10, line 8) for docking a camera, the method comprising the steps of: coupling the camera to a docking station platform (see, e.g., Figure 10, reference numeral 1004, page 9, line 29 to page 10, line 8); and rotating the camera relative to the base and about an axis of rotation, the rotation permitted by the docking station platform configured to couple to a docking station base such that the docking station platform may be rotated about the axis of rotation (see, e.g., Figure 10, reference numeral 1006, page 9, line 29 to page 10, line 8).

Embodiments of the claimed subject matter, such as those defined by claim 15, define a system (see, e.g., Figure 1, reference numeral 100, page 2, line 1 to page 3, line 10) for docking a camera (see, e.g., Figure 1, reference numeral 102, page 2, line 1 to page 3, line 10), comprising: means for physically coupling (see, e.g., Figures 3 and 4, reference numeral 302, 308, 402, 404, page 4, line 13 to page 5, line 22) the camera to a docking station platform (see, e.g., Figure 1, reference numeral 104, page 3, lines 11-18); means for communicatively coupling (see, e.g., Figure 4, reference numerals 404, 406, 408, page 5, lines 14-22) the camera to a docking station platform; and means for rotating (see, e.g.,

Figures 3 and 4, reference numerals 302, 402, page 4, line 13 to page 5, line 22) the camera relative to a docking station base (see, e.g., Figure 1, reference numeral 106, page 3, lines 11-18) and about an axis of rotation (see, e.g., Figure 2, reference numeral 114, page 4, lines 1-12), the rotation permitted by the docking station platform configured to couple to the docking station base such that the docking station platform may be rotated about the axis of rotation.

Embodiments of the claimed subject matter, such as those defined by claim 15, define the system of claim 15 wherein the means for communicatively coupling further comprises means for coupling the camera to a pedestal platform (see, e.g., Figure 8, reference numeral 804, page 7, lines 31-34) such that marketing devices are placed on the pedestal platform (see, e.g., page 8, lines 3-9).

VI. GROUNDS OF REJECTION TO BE REVIEWED ON APPEAL

The FINAL Office Action rejected claims 1-4, 6, and 9-19 under 35 U.S.C. § 102(e) as allegedly anticipated by *Takahashi et al.* ("Takahashi," U.S. Pat. No. 2004/0004671).

The FINAL Office Action rejected claim 5 under 35 U.S.C. § 103(a) as allegedly unpatentable over *Takahashi* in view of *Omps* (U.S. Patent No. 7,163,181).

The FINAL Office Action rejected claims 7, 8 and 20 under 35 U.S.C. § 103(a) as allegedly unpatentable over *Takahashi* in view of *Rudduck et al.* ("Rudduck," U.S. Pat. Pub. No. 2003/0075603).

VII. ARGUMENT

A. Claim Rejections - 35 U.S.C. § 102(e) - Claims 1-4, 6, 9-19 and *Takahashi*

The FINAL Office Action rejected claims 1-4, 6, and 9-19 under 35 U.S.C. § 102(e) as allegedly anticipated by *Takahashi et al.* ("Takahashi," U.S. Pat. No. 2004/0004671). It is axiomatic that "[a]nticipation requires the disclosure in a single prior art reference of each element of the claim under consideration." *W. L. Gore & Associates, Inc. v. Garlock, Inc.*, 721

F.2d 1540, 1554, 220 USPQ 303, 313 (Fed. Cir. 1983). Therefore, every claimed feature of the claimed invention must be represented in the applied reference to constitute a proper rejection under 35 U.S.C. § 102(e).

For at least the reasons set forth herein, Appellants respectfully disagree with the rejection and request that the rejection be overturned.

Independent Claim 1

Claim 1 recites (with emphasis added):

1. A system which docks a camera, comprising:
a base; and
a platform configured to dock with the camera and configured to couple to the base such that the platform may be rotated relative to the base and about an axis of rotation.

Appellants respectfully submit that *Takahashi* does not disclose, teach, or suggest at least the above-emphasized claim features. The FINAL Office Action refers to Figure 13 of *Takahashi* and appears to equate the base with reference 602 and the platform with reference 604 (see page 2 of the Office Action). Appellants respectfully disagree that this new interpretation presented by the FINAL Office Action anticipates or suggests the language of the claim. From Figure 13 of *Takahashi*, it is clear that the element 604 is not coupled to element 602. Instead, element 604 appears to be coupled to element 702. Further, *Takahashi* provides the following description with regard to the structure shown in Figure 13 on page 7, paragraph [0012] (emphasis added):

The cradle 700 shown in FIG. 13 has a rotation system in a coupling portion 702 between the camera mounting unit 604 and the leg portion 602. As shown in FIG. 13, the camera mounting unit 604 is mounted rotatably on the leg portion 602 with a rotation axis 703 placed in the center parallel to the vertical direction of the cradle 700. The user can easily rotate the camera mounting unit 604 by hand. In the case of the cradle 700 having the above-mentioned rotation system, it is preferable that the power input terminal 610 and the digital communications terminal 612 are mounted on the leg portion 602.

Appellants respectfully submit that this recited section of *Takahashi* and Figure 13 make it clear that *Takahashi* fails to disclose, teach, or suggest at least the above-emphasized claim

limitations. Indeed, the description of *Takahashi* above might suggest to one having ordinary skill in the art that the elements 602, 604, and 702 provide an effect that is opposite to the alleged coupling between 602 and 604.

The Advisory Action responds to the above argument on pages 3-4 as follows (no emphasis added):

As discussed in the previous Office Action (mailed on July 27, 2007), the *Takahashi* reference (as shown in fig. 13) discloses a system (Fig. 13) which docks a camera (Camera 510 shown in fig. 11), comprising: a base (Fig. 13: 602); **and a platform** (Figs. 13: 604) **configured to dock with the camera and configured to couple to the base** (As shown in fig. 13 and discussed in page 7, ¶ 0012, *Takahashi* discloses a coupling portion 702 between the camera mounting unit 604 and the leg portion 602. *The American Heritage College Dictionary* (Fourth Edition, 2002) defines the word “**coupling**” as a device that link or connect; and also defines the word “**couple**” as 1) a link; 2) Something that joins or connect two things together. Therefore, by teaching the **coupling portion 702** between camera mounting unit 604 (which, the Examiner reads as the claimed platform in the last Office Action) and the leg portion 602 (which, the Examiner reads as the last Office Action), *Takahashi* discloses that the platform is configured to dock with the camera and is also configured to couple to the base since by using the coupling portion 702 to connect or join together the camera mounting unit 604 and the leg portion 602, *Takahashi* discloses that said platform is configured to couple to the base) such that the platform (604) may be rotated relative to the base (602) and about an axis of rotation (Note that the platform rotates about the base 602 as taught in page 7, ¶ 0111-0118); See also axis of rotation as shown in figs. 13 and 14 (See also page 5, ¶ 0094 – page 6, ¶ 0102; page 7, ¶ 0111-0118)). The Examiner notes that the structure of the platform and the base configuration as discussed in the Specification and Drawings in the Applications appear to teach a different way to couple said platform to the base. However, the claim as written does not offer a description that differs from the *Takahashi* teaching.

Appellants respectfully disagree. It is clear that there is an intermediate element located between the base 602 and the platform 604 of *Takahashi*, namely, coupling portion 702. The definitions from the *American Heritage College Dictionary* cited by the Examiner refer to “coupling” and “couple.” It is respectfully noted that claim 1 does not refer to “coupling,” and so the definition of that term is irrelevant to the discussion. Further, the definition for “couple” appears to refer to a noun. In contrast, the term used in claim 1 is a verb. Indeed, the explicit claim terminology recited in claim 1 is “**a platform** configured to... **couple to** the base.” Thus, the attempt to equate the terms from the *American Heritage College Dictionary* with the claim language is based on a faulty grammatical premise, and hence in error. Accordingly,

Appellants respectfully request that the rejection be overturned.

Because independent claim 1 is allowable over *Takahashi*, dependent claims 2-4, 6, and 9-10 are allowable as a matter of law for at least the reason that the dependent claims 2-4, 6, and 9-10 contain all elements of their respective base claim. See, e.g., *In re Fine*, 837 F.2d 1071 (Fed. Cir. 1988). Hence, Appellants respectfully request that the rejection to claims 2-4, 6, and 9-10 be overturned.

Independent Claim 11

Claim 11 recites (with emphasis added):

11. A method for docking a camera, the method comprising the steps of:
coupling the camera to a docking station platform; and
rotating the camera relative to the base and about an axis of rotation,
the rotation permitted by the docking station platform configured to couple to a docking station base such that the docking station platform may be rotated about the axis of rotation.

Appellants respectfully submit that *Takahashi* does not disclose, teach, or suggest at least the above-emphasized claim features. The FINAL Office Action refers to Figure 13 of *Takahashi* and appears to equate the base with reference 602 and the platform with reference 604 (see page 2 of the Office Action). Appellants respectfully disagree that this new interpretation presented by the FINAL Office Action anticipates or suggests the language of the claim. From Figure 13 of *Takahashi*, it is clear that the element 604 is not coupled to element 602. Instead, element 604 appears to be coupled to element 702. Further, *Takahashi* provides the following description with regard to the structure shown in Figure 13 on page 7, paragraph [0012] (emphasis added):

The cradle 700 shown in FIG. 13 has a rotation system in a coupling portion 702 between the camera mounting unit 604 and the leg portion 602. As shown in FIG. 13, the camera mounting unit 604 is mounted rotatably on the leg portion 602 with a rotation axis 703 placed in the center parallel to the vertical direction of the cradle 700. The user can easily rotate the camera mounting unit 604 by hand. In the case of the cradle 700 having the above-mentioned rotation system, it is preferable that the power input terminal 610 and the digital communications terminal 612 are mounted on the leg portion 602.

Appellants respectfully submit that this recited section of *Takahashi* and Figure 13 make it clear

that *Takahashi* fails to disclose, teach, or suggest at least the above-emphasized claim limitations. Indeed, the description of *Takahashi* above might suggest to one having ordinary skill in the art that the elements 602, 604, and 702 provide an effect that is opposite to the alleged coupling between 602 and 604.

The Advisory Action responds to the above argument on pages 3-4 as follows (no emphasis added):

As discussed in the previous Office Action (mailed on July 27, 2007), the *Takahashi* reference (as shown in fig. 13) discloses a system (Fig. 13) which docks a camera (Camera 510 shown in fig. 11), comprising: a base (Fig. 13: 602); **and a platform** (Figs. 13: 604) **configured to dock with the camera and configured to couple to the base** (As shown in fig. 13 and discussed in page 7, ¶ 0012, *Takahashi* discloses a coupling portion 702 between the camera mounting unit 604 and the leg portion 602. *The American Heritage College Dictionary* (Fourth Edition, 2002) defines the word “**coupling**” as a device that link or connect; and also defines the word “**couple**” as 1) a link; 2) Something that joins or connect two things together. Therefore, by teaching the **coupling portion 702** between camera mounting unit 604 (which, the Examiner reads as the claimed platform in the last Office Action) and the leg portion 602 (which, the Examiner reads as the last Office Action), *Takahashi* discloses that the platform is configured to dock with the camera and is also configured to couple to the base since by using the coupling portion 702 to connect or join together the camera mounting unit 604 and the leg portion 602, *Takahashi* discloses that said platform is configured to couple to the base) such that the platform (604) may be rotated relative to the base (602) and about an axis of rotation (Note that the platform rotates about the base 602 as taught in page 7, ¶ 0111-0118); See also axis of rotation as shown in figs. 13 and 14 (See also page 5, ¶ 0094 – page 6, ¶ 0102; page 7, ¶ 0111-0118)). The Examiner notes that the structure of the platform and the base configuration as discussed in the Specification and Drawings in the Applications appear to teach a different way to couple said platform to the base. However, the claim as written does not offer a description that differs from the *Takahashi* teaching.

Appellants respectfully disagree. It is clear that there is an intermediate element located between the base 602 and the platform 604 of *Takahashi*, namely, coupling portion 702. The definitions from the *American Heritage College Dictionary* cited by the Examiner refer to “coupling” and “couple.” It is respectfully noted that claim 11 does not refer to “coupling,” and so the definition of that term is irrelevant to the discussion. Further, the definition for “couple” appears to refer to a noun. In contrast, the term used in claim 11 is a verb. Indeed, the explicit claim terminology recited in claim 11 is “**a platform** configured to... **couple to** a docking station base.” Thus, the attempt to equate the terms from the *American Heritage College*

Dictionary with the claim language is based on a faulty grammatical premise, and hence in error. Accordingly, Appellants respectfully request that the rejection be overturned.

Because independent claim 11 is allowable over *Takahashi*, dependent claims 12-14 are allowable as a matter of law. Hence, Appellants respectfully request that the rejection to claims 12-14 be overturned.

Independent Claim 15

Claim 15 recites (with emphasis added):

15. A system for docking a camera, comprising:
means for physically coupling the camera to a docking station platform;
means for communicatively coupling the camera to a docking station platform; and
means for rotating the camera relative to a docking station base and about an axis of rotation, the rotation permitted by the docking station platform configured to couple to the docking station base such that the docking station platform may be rotated about the axis of rotation.

Appellants respectfully submit that *Takahashi* does not disclose, teach, or suggest at least the above-emphasized claim features. The FINAL Office Action refers to Figure 13 of *Takahashi* and appears to equate the base with reference 602 and the platform with reference 604 (see page 2 of the Office Action). Appellants respectfully disagree that this new interpretation presented by the FINAL Office Action anticipates or suggests the language of the claim. From Figure 13 of *Takahashi*, it is clear that the element 604 is not coupled to element 602. Instead, element 604 appears to be coupled to element 702. Further, *Takahashi* provides the following description with regard to the structure shown in Figure 13 on page 7, paragraph [0012] (emphasis added):

The cradle 700 shown in FIG. 13 has a rotation system in a coupling portion 702 between the camera mounting unit 604 and the leg portion 602. As shown in FIG. 13, the camera mounting unit 604 is mounted rotatably on the leg portion 602 with a rotation axis 703 placed in the center parallel to the vertical direction of the cradle 700. The user can easily rotate the camera mounting unit 604 by hand. In the case of the cradle 700 having the above-mentioned rotation system, it is preferable that the power input terminal 610 and the digital communications terminal 612 are mounted on the leg portion 602.

Appellants respectfully submit that this recited section of *Takahashi* and Figure 13 make it clear that *Takahashi* fails to disclose, teach, or suggest at least the above-emphasized claim limitations. Indeed, the description of *Takahashi* above might suggest to one having ordinary skill in the art that the elements 602, 604, and 702 provide an effect that is opposite to the alleged coupling between 602 and 604.

The Advisory Action responds to the above argument on pages 3-4 as follows (no emphasis added):

As discussed in the previous Office Action (mailed on July 27, 2007), the *Takahashi* reference (as shown in fig. 13) discloses a system (Fig. 13) which docks a camera (Camera 510 shown in fig. 11), comprising: a base (Fig. 13: 602); **and a platform** (Figs. 13: 604) **configured to dock with the camera and configured to couple to the base** (As shown in fig. 13 and discussed in page 7, ¶ 0012, *Takahashi* discloses a coupling portion 702 between the camera mounting unit 604 and the leg portion 602. *The American Heritage College Dictionary* (Fourth Edition, 2002) defines the word “**coupling**” as a device that link or connect; and also defines the word “**couple**” as 1) a link; 2) Something that joins or connect two things together. Therefore, by teaching the **coupling portion 702** between camera mounting unit 604 (which, the Examiner reads as the claimed platform in the last Office Action) and the leg portion 602 (which, the Examiner reads as the last Office Action), *Takahashi* discloses that the platform is configured to dock with the camera and is also configured to couple to the base since by using the coupling portion 702 to connect or join together the camera mounting unit 604 and the leg portion 602, *Takahashi* discloses that said platform is configured to couple to the base) such that the platform (604) may be rotated relative to the base (602) and about an axis of rotation (Note that the platform rotates about the base 602 as taught in page 7, ¶ 0111-0118); See also axis of rotation as shown in figs. 13 and 14 (See also page 5, ¶ 0094 – page 6, ¶ 0102; page 7, ¶ 0111-0118)). The Examiner notes that the structure of the platform and the base configuration as discussed in the Specification and Drawings in the Applications appear to teach a different way to couple said platform to the base. However, the claim as written does not offer a description that differs from the *Takahashi* teaching.

Appellants respectfully disagree. It is clear that there is an intermediate element located between the base 602 and the platform 604 of *Takahashi*, namely, coupling portion 702. The definitions from the *American Heritage College Dictionary* cited by the Examiner refer to “coupling” and “couple.” It is respectfully noted that claim 15 does not refer to “coupling,” and so the definition of that term is irrelevant to the discussion. Further, the definition for “couple” appears to refer to a noun. In contrast, the term used in claim 15 is a verb. Indeed, the explicit claim terminology recited in claim 15 is “**a platform** configured to... **couple to** the base.”

Thus, the attempt to equate the terms from the ***American Heritage College Dictionary*** with the claim language is based on a faulty grammatical premise, and hence in error. Accordingly, Appellants respectfully request that the rejection be overturned.

Additionally, it is noted that the admission, “[T]he Examiner notes that the structure of the platform and the base configuration as discussed in the Specification and Drawings in the Applications appear to teach a different way to couple said platform to the base,” would appear to render the rejection to the means plus function claim improper since the means are not equivalent.

Because independent claim 15 is allowable over *Takahashi*, dependent claims 16-19 are allowable as a matter of law. Hence, Appellants respectfully request that the rejection to claims 16-19 be overturned.

For at least the forgoing reasons, it is Appellants’ position that *Takahashi* fails to anticipate all features of claims 1-4, 6, and 9-19, and thus Appellants respectfully submit that the rejections to claims 1-4, 6, and 9-19 should be overturned.

B. Claim Rejections - 35 U.S.C. § 103(a) – Claim 5 and *Takahashi* in view of *Omps*

The FINAL Office Action rejected claim 5 under 35 U.S.C. § 103(a) as allegedly unpatentable over *Takahashi* in view of *Omps* (U.S. Patent No. 7,163,181). The U.S. Patent and Trademark Office (“USPTO”) has the burden under section 103 to establish a *prima facie* case of obviousness according to the factual inquiries expressed in *Graham v. John Deere Co.*, 383 U.S. 1, 148 USPQ 459 (1966). The four factual inquiries, also expressed in MPEP 2100-116, are as follows:

- (A) Determining the scope and contents of the prior art;
- (B) Ascertaining the differences between the prior art and the claims in issue;
- (C) Resolving the level of ordinary skill in the pertinent art; and
- (D) Evaluating evidence of secondary considerations.

Appellants respectfully submit that a *prima facie* case of obviousness is not established using the art of record. For at least the reasons set forth herein, Appellants respectfully disagree with the rejection and request that the rejection be overturned.

As set forth above, Appellants respectfully submit that *Takahashi* does not disclose, teach, or suggest at least the above-emphasized features of claim 1. Further, Appellants respectfully submit that *Omps* fails to remedy these deficiencies. Accordingly, for at least the reasons that claim 5 incorporates the allowable claim features of independent claim 1, Appellants respectfully submit that claim 5 is allowable as a matter of law, and hence respectfully request that the rejection be overturned.

For at least the forgoing reasons, it is Appellants' position that a *prima facie* for obviousness has not been made against Appellants' claims, and thus the rejections to claim 5 should be overturned.

C. Claim Rejections - 35 U.S.C. § 103(a) – Claims 7, 8, 20 and *Takahashi* in view of *Rudduck*

The FINAL Office Action rejected claims 7, 8 and 20 under 35 U.S.C. § 103(a) as allegedly unpatentable over *Takahashi* in view of *Rudduck et al.* ("*Rudduck*," U.S. Pat. Pub. No. 2003/0075603). The U.S. Patent and Trademark Office ("USPTO") has the burden under section 103 to establish a *prima facie* case of obviousness according to the factual inquiries expressed in *Graham v. John Deere Co.*, 383 U.S. 1, 148 USPQ 459 (1966). The four factual inquiries, also expressed in MPEP 2100-116, are as follows:

- (A) Determining the scope and contents of the prior art;
- (B) Ascertaining the differences between the prior art and the claims in issue;
- (C) Resolving the level of ordinary skill in the pertinent art; and
- (D) Evaluating evidence of secondary considerations.

Appellants respectfully submit that a *prima facie* case of obviousness is not established

using the art of record. For at least the reasons set forth herein, Appellants respectfully disagree with the rejection and request that the rejection be overturned.

As set forth above, Appellants respectfully submit that *Takahashi* does not disclose, teach, or suggest at least the above-emphasized features of claims 1 and 15. Further, Appellants respectfully submit that *Rudduck* fails to remedy these deficiencies. Accordingly, for at least the reasons that claims 7, 8, and 20 incorporate allowable claim features of their respective base claim, Appellants respectfully submit that claims 7, 8, and 20 are allowable as a matter of law, and hence respectfully request that the rejection be overturned.

For at least the forgoing reasons, it is Appellants' position that a *prima facie* for obviousness has not been made against Appellants' claims, and thus the rejections to claims 7, 8, and 20 should be overturned.

CONCLUSION

Based upon the foregoing discussion, Appellants respectfully request that the Examiner's FINAL rejection of claims 1-20 be overturned by the Board, and that the application be allowed to issue as a patent with all pending claims 1-20.

In addition to the claims shown in the claims Appendix VIII, Appendix IX attached hereto indicates that there is no evidence being attached and relied upon by this brief. Appendix X attached hereto indicates that there are no related proceedings.

Please charge Hewlett-Packard Company's deposit account 08-2025 in the amount of \$510 for the filing of this Appeal Brief. No additional fees are believed to be due in connection with this Appeal Brief. If, however, any additional fees are deemed to be payable, you are hereby authorized to charge any such fees to deposit account No. 08-2025.

Respectfully submitted,

/dr/

David Rodack
Reg. No.: 47,034

VIII. CLAIMS - APPENDIX

1. A system which docks a camera, comprising:
a base; and
a platform configured to dock with the camera and configured to couple to the base such that the platform may be rotated relative to the base and about an axis of rotation.
2. The system of claim 1, wherein the camera, when docked to the platform, may be rotated about the axis of rotation.
3. The system of claim 1, further comprising a connection member coupled to the platform and configured to insert into a matching recess residing in the camera such that when the camera is docked to the platform, the camera is rigidly coupled to the connection member.
4. The system of claim 1, further comprising a plurality of connectors configured to communicatively couple the docked camera with a processing system.
5. The system of claim 1, further comprising at least one leg coupled to the base.
6. The system of claim 1, further comprising a cavity residing in a top surface of the platform, the cavity corresponding to the base of the camera such that when the camera is docked to the platform, the camera is rigidly coupled to the platform.
7. The system of claim 1, wherein the platform further comprises a pedestal platform, the pedestal platform configured to dock the camera and to display marketing devices placed on the pedestal platform.

8. The system of claim 7, further comprising:
a pedestal base; and
a plurality of pedestal platforms wherein a plurality of cameras may be docked.
9. The system of claim 1, further comprising a communication device, wherein the communication device uses a communication medium to communicatively couple the docked camera to a processing system.
10. The system of claim 9, wherein the communication medium comprises at least one selected from a group consisting of a wire connection medium, an infrared medium, a cable medium, a microwave medium, a radio frequency (RF) medium, an intermediary communication system may be employed, a telephony system medium and an Internet medium.
11. A method for docking a camera, the method comprising the steps of:
coupling the camera to a docking station platform; and
rotating the camera relative to the base and about an axis of rotation, the rotation permitted by the docking station platform configured to couple to a docking station base such that the docking station platform may be rotated about the axis of rotation.
12. The method of claim 11, further comprising the step of communicating information from the camera to a processing system.
13. The method of claim 12, wherein the step of communicating further comprises the step of communication with a communication medium used by a communication device.

14. The method of claim 13, wherein the communication medium comprises at least one selected from a group consisting of a wire connection medium, an infrared medium, a cable medium, a microwave medium, a radio frequency (RF) medium, an intermediary communication system may be employed, a telephony system medium and an Internet medium.

15. A system for docking a camera, comprising:
means for physically coupling the camera to a docking station platform;
means for communicatively coupling the camera to a docking station platform; and
means for rotating the camera relative to a docking station base and about an axis of rotation, the rotation permitted by the docking station platform configured to couple to the docking station base such that the docking station platform may be rotated about the axis of rotation.

16. The system of claim 15, further comprising means for rigidly coupling the camera to the docking station platform.

17. The system of claim 15, further comprising means for communicating information from the camera to a processing system.

18. The system of claim 17, wherein the means for communicating further comprises means for communicating with a communication medium used by a communication device.

19. The system of claim 18, wherein the communication medium comprises at least one selected from a group consisting of a wire connection medium, an infrared medium, a cable medium, a microwave medium, a radio frequency (RF) medium, an intermediary communication system may be employed, a telephony system medium and an Internet

medium.

20. The system of claim 15, wherein the means for communicatively coupling further comprises means for coupling the camera to a pedestal platform such that marketing devices are placed on the pedestal platform.

IX. EVIDENCE - APPENDIX

(None)

X. RELATED PROCEEDINGS - APPENDIX

(None)